

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Tracking of)
 (Identify the person to be tracked or describe)
 the object or property to be used for tracking))
 A grey 2010 Honda Accord, Vehicle Identification Number)
 5KBCP3675AB801056, bearing Sonora, Mexico plate)
 number VUW-622-B, as further described in Attachment A.)

Case No. MJ23-036

APPLICATION FOR A TRACKING WARRANT

I, a federal law enforcement officer or attorney for the government, have reason to believe that the person, property, or object described above has been and likely will continue to be involved in one or more violations of

21 U.S.C. §§ 841(a)(1), 846 . Therefore, in furtherance of a criminal investigation, I request authority to install and use a tracking device or use the tracking capabilities of the property or object described above to determine location. The application is based on the facts set forth on the attached sheet.

☒ The person, property, or object is located in this district.

☐ The person, property, or object is not now located in this district, but will be at the time of execution.

☐ The activity in this district relates to domestic or international terrorism.

☐ Other:

The tracking will likely reveal these bases for the warrant under Fed. R. Crim. P. 41(c): (check one or more)

☒ evidence of a crime;

☒ property designed for use, intended for use, or used in committing a crime;

☒ contraband, fruits of crime, or other items illegally possessed;

☐ a person to be arrested or a person who is unlawfully restrained.

☒ I further request, for purposes of installing, maintaining or removing the tracking device, authority to enter the following vehicle or private property, or both:
See Attachment A

☒ Delayed notice of ____ days (give exact ending date if more than 30 days: 05/23/2023) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means ☐ telephonically recorded.

DAVID CHIRDON Digitally signed by DAVID CHIRDON
Date: 2023.01.23 18:16:25 -08'00'

Applicant's signature

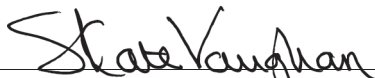
David Chirdon, DEA Special Agent

Applicant's printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 01/23/2023

City and state: Seattle, Washington


Judge's signature

S. Kate Vaughan, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
VEHICLE TRACKING WARRANT**

STATE OF WASHINGTON)
COUNTY OF PIERCE) ss

I, David Chirdon, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I make this affidavit in support of an application to obtain a tracking warrant for one target vehicle used by JESUS DANIEL ZAVALA JR and/or MARIA LORETO ROMERO QUEZEDA in furtherance of an investigation into the El Pariente Drug Trafficking Organization (DTO) (the Target Vehicle):

a. **Target Vehicle 8 (TV8):** A grey 2010 Honda Accord, Vehicle Identification Number 5KBCP3675AB801056, bearing Sonora, Mexico plate number VUW-622-B, registration information unknown, as described in Attachment A.

2. Based on the facts set forth in this Affidavit, there is probable cause to believe that violations of Title 21, United States Code, Sections 841(a)(1) and 846 (distribution of controlled substances and conspiracy to distribute controlled substances) have been committed, are being committed, and will be committed by ZAVALA JR and/or ROMERO QUEZEDA, members and associates of the “El Pariente” DTO, and others known and unknown. There is also probable cause to believe that ZAVALA JR and/or ROMERO QUEZEDA and others are using the Target Vehicle in furtherance of these crimes and that their whereabouts over time will constitute evidence of those criminal violations. Obtaining the information sought in this affidavit will likely lead to the collection of further evidence of these offenses, including the identification of other individuals who are engaged in the commission of these offenses.

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1 3. I am a Special Agent (SA) with the Drug Enforcement Administration
2 (DEA), employed in that capacity since June 2022, and currently assigned to the DEA
3 Tacoma Resident Office in the Seattle Field Division. I am a criminal investigator of the
4 United States within the definition of 18 U.S.C. § 2510(7), and am empowered by law to
5 conduct investigations and to make arrests for offenses enumerated in Title 21 and Title
6 18 United States Code. My training and experience include, but are not limited to, a 17-
7 week course at the DEA academy in Quantico, Virginia. At the DEA academy, I was
8 trained in all aspects of conducting narcotics investigations to include debriefing
9 defendants, witnesses, and informants, conducting surveillance, executing search
10 warrants, conducting controlled deliveries, utilizing law enforcement, open source, and
11 social media databases, and seizing narcotics and narcotics-related assets. Prior to my
12 employment with DEA, I served four years on active duty in the United States Navy and
13 three years in the United States Army National Guard.

14 4. During the course of my law enforcement career, I have become familiar
15 with investigations of numerous criminal offenses, including the offenses involved in the
16 current investigation. I have participated in criminal investigations of illicit drug
17 trafficking organizations, ranging from street-level dealers to major dealers, including
18 drug trafficking organizations linked to Mexico-based organizations. These investigations
19 have also included the unlawful importation, possession with intent to distribute, and
20 distribution of controlled substances; the related laundering of monetary instruments; the
21 conducting of monetary transactions involving the proceeds of specified unlawful
22 activities; and conspiracies associated with criminal narcotics offenses. These
23 investigations have included use of the following investigative techniques: confidential
24 informants; undercover agents; analysis of pen register and toll records; physical and
25 electronic surveillance; wiretaps; and the execution of search warrants. I have also
26 interviewed defendants at the time of their arrests and have debriefed, spoken with, or
27 interviewed numerous drug dealers or confidential sources (informants) at proffer

1 interviews who were experienced in speaking in coded conversations over the telephone.
2 I have gained knowledge regarding the various methods, techniques, codes, and/or jargon
3 used by drug traffickers in the course of their criminal activities, including their use of
4 cellular telephones and other electronic devices to facilitate communications while
5 avoiding law enforcement scrutiny.

6 5. The facts set forth in this affidavit are based on my own personal
7 knowledge; knowledge obtained from other individuals during my participation in this
8 investigation, including other law enforcement personnel; review of documents and
9 records related to this investigation; communications with others who have personal
10 knowledge of the events and circumstances described herein; and information gained
11 through my training and experience. Because this affidavit is submitted for the limited
12 purpose of establishing probable cause in support of the Application for a search warrant
13 and pen register/trap and trace device, it does not set forth each and every fact that I or
14 others have learned during the course of this investigation.

15 SOURCES OF INFORMATION

16 6. I obtained the facts set forth in this affidavit through personal participation
17 in the investigation, from oral and written reports of other law enforcement officers, from
18 records, documents and other evidence obtained during this investigation, and from
19 confidential sources and sources of information who are associated with, and
20 knowledgeable about, the subjects of this investigation and their confederates. I have
21 obtained and read official reports prepared by various law enforcement officers
22 participating in this investigation and in the other related investigations by agencies
23 referenced in this affidavit.

24 7. When this affidavit refers to vehicle ownership, either I or other agents¹
25

26 ¹ When I use the term "agents" or "investigators" throughout the affidavit, I am referring to law enforcement
27 personnel, including, but not limited to DEA and HSI agents and task force officers (TFOs), as well as personnel
associated with other state and federal law enforcement agencies.

involved in the investigation reviewed the relevant state vehicle records from the Washington State Department of Licensing (DOL), or the equivalent agency in other states. Similarly, when this affidavit refers to identification documents, either I or other agents involved in the investigation reviewed the relevant driver's license or similar records maintained by DOL, or the equivalent agencies in other states. When this affidavit refers to the criminal history of a subject, either I or other agents involved in the investigation reviewed the available criminal history from state or federal agencies. When this affidavit refers to telephone subscription records, either I or other agents involved in the investigation reviewed the subscriber records obtained from the telephone company by administrative subpoena or court order, or I obtained the information from other law enforcement officers familiar with this investigation. When this affidavit refers to telephone toll records, either myself, or other agents involved in the investigation received information from the telephone company pursuant to an administrative subpoena or court authorized pen registers. When this affidavit refers to beliefs or conclusions of investigators, these beliefs and conclusions are based on the collective training and experience of the agents involved in this investigation.

CONFIDENTIAL SOURCES

8. Confidential Source 1 (CS-1) is a DEA confidential source that has been providing information to DEA investigators for approximately five years. More specifically, CS-1 has provided reliable information which has resulted in arrests and seizures of narcotics, including methamphetamine, fentanyl and heroin. This information has benefited multiple law enforcement organizations to include agencies at the federal and state level. The information provided by CS-1 has been corroborated and considered reliable. CS-1 is providing information for monetary compensation and immigration benefits. CS-1 has a criminal history that includes one felony arrest related to drug trafficking in 2002. To my knowledge, CS-1 has not provided any false information to investigators in the capacity as a confidential source.

1 9. Confidential Source 3 (CS-3) has been providing information and
2 assistance to the DEA since 2015. CS-3 has a criminal history consisting of one felony
3 burglary conviction from 2012, and two felony drug trafficking arrests, where no charges
4 were filed. CS-3 is currently providing information and assistance to the DEA in
5 exchange for monetary compensation and immigration benefits. Since 2015, CS-3 has
6 provided reliable information and assistance to the DEA in numerous drug trafficking
7 investigations. CS-3 has conducted more than 20 controlled drug purchases and provided
8 information that was proven reliable and led to the arrest and convictions of numerous
9 drug traffickers. CS-3 is familiar with the appearance of methamphetamine, cocaine, and
10 heroin, and the way they are packaged, transported, and sold. Investigations that CS-3 has
11 participated in have resulted in seizures of hundreds of pounds of methamphetamine,
12 thousands of fentanyl pills, kilograms of heroin, and hundreds of firearms.

13 **SUMMARY OF PROBABLE CAUSE**

14 **Summary of DEA Investigation of El Pariente DTO.**

15 10. In February 2022, DEA agents met with CS-1 in order to discuss a DTO
16 operating out of Sinaloa, Mexico. CS-1 told agents the group used semi-tractor trailers to
17 transport drugs from Mexico to multiple cities in Washington, including Tacoma, Kent,
18 Yakima, and Spokane. CS-1 said each tractor trailer transported a specific drug, for
19 instance, methamphetamine, heroin, fentanyl, or cocaine, and there was also a designated
20 tractor trailer to pick up drug proceeds. CS-1 said the boss and source of supply is known
21 as “El Pariente” and he had multiple cells operating in Washington. CS-1 also believed
22 the group had cells in multiple states, including Colorado, Arizona, Texas, and
23 California. CS-1 said that CS-1 typically talked with El Pariente directly, typically on the
24 WhatsApp application, and said it would be possible to set up controlled buys with
25 “El Pariente’s” local couriers.

26 11. Through October 2022, agents have conducted five controlled buys, each
27 arranged through “El Pariente,” in which drugs were delivered by couriers. Through these

1 controlled buys, agents obtained a total of approximately nine pounds of
2 methamphetamine and two thousand suspected fentanyl pills. In addition to these
3 controlled buys, in late March 2022, agents in Oregon recovered approximately twenty-
4 three pounds of methamphetamine and over forty thousand suspected fentanyl pills from
5 a suspected courier of “El Pariente.” Additionally, in July 2022 agents conducted a search
6 warrant in Lynnwood, Washington, and seized another five pounds of methamphetamine,
7 approximately 25,000 fentanyl pills, and smaller amounts of heroin. Finally, on
8 November 22, 2022, agents conducted a search warrant in Tukwila, Washington, and
9 recovered approximately 140,000 suspected fentanyl pills (including packages containing
10 multi-colored pills and blue M30s); 1,368 grams of suspected fentanyl powder, 7,726
11 grams of methamphetamine, one stolen firearm, approximately \$25,000 in bulk U.S.
12 Currency, and one 2017 Dodge Charger. Between the seizures and controlled purchases
13 described above, approximately fifty-six pounds of methamphetamine, approximately
14 three pounds of heroin, and over two-hundred thousand fentanyl pills have been seized
15 during the investigation involving “El Pariente.”

16 **December 2022 Controlled Buy and Identification of the Target Vehicle**

17 12. In December 2022, agents from the DEA’s Tacoma Resident Office
18 conducted a sixth controlled buy in this investigation. Agents met with CS-3 at a
19 predetermined location and searched CS-3’s person and vehicle for any drugs, money,
20 weapons or contraband with negative results. At this time, the CS-3 made a recorded
21 phone call, in the presence of agents, to a drug trafficker known to CS-3 and agents as
22 “El Pariente,” at the WhatsApp account associated with Mexican phone number 52-662-
23 937-7659, and ordered a quantity of methamphetamine. “El Pariente” set the price and
24 CS-3 agreed. “El Pariente” advised CS-3 that an associate, referred to by “El Pariente” as
25 “Chicho,” would have a local courier contact CS-3 and set a meeting time and place for
26 the deal.
27

1 13. A short time later, consistent with “El Pariente’s” statements, CS-3
2 received text messages and several phone calls from (360) 916-9377 (further referred to
3 as Target Telephone 15, or TT15). Through these calls and messages, the user of TT15
4 agreed with CS-3 on a meeting location in Tacoma, Washington, where the
5 methamphetamine purchase would take place. At this time, Agents provided CS-3 with
6 money for the purchase of methamphetamine, final instructions, and a listening and
7 recording device for the deal. CS-3 departed the meeting location and agents followed.
8 From this point forward, CS-3 was under continuous surveillance by agents until the
9 conclusion of the deal.

10 14. Upon arriving to the agreed-upon location in Tacoma, Washington, CS-3
11 contacted the user of TT15 and informed the user that he/she had arrived. The user of
12 TT15 advised CS-3 that another individual would be contacting CS-3 shortly. A few
13 minutes later, CS-3 received a phone call from (360) 442-1454 (further referred to as
14 Target Telephone 16, or TT16). The user of TT16 told CS-3 that he was driving a white
15 SUV and asked CS-3 to follow it when he arrived, and CS-3 agreed.

16 15. A white 2019 Chevrolet Equinox bearing no license plates (further referred
17 to as Target Vehicle 6, or TV6) arrived and-parked near CS-3’s vehicle. Agents observed
18 both CS-3 and TV6 drive around the block in tandem, then park on an adjacent street.
19 Immediately after, CS-3 walked to TV6 and entered the front passenger door of TV6.

20 16. A few minutes later, CS-3 exited TV6 and returned to his/her vehicle. TV6
21 left the deal location and agents followed. CS-3 departed and again met with agents at a
22 predetermined location.

23 17. Agents took possession of a large green plastic bag containing two clear
24 Ziploc bags, which contained a white/clear crystalline substance, consistent with
25 methamphetamine. CS-3 and the vehicle were again searched by agents for any drugs,
26 money, weapons or contraband with negative results. During the debrief, CS-3 described
27

1 the courier (the driver of TV6, believed to be the user of TT16) as a dark-skinned
2 Hispanic male, approximately 32-35 years of age with dark-colored hair.

3 18. After the deal, agents witnessed TV6 park at the Royal Pacific Apartments,
4 located at 7645 Pacific Ave, Tacoma, WA 98408, and watched the driver, who matched
5 the description given by CS-3, exit TV6 and walk into the apartment building. The exact
6 apartment was unable to be determined because of obstructions.

7 19. While still under surveillance, TV6 left 7645 Pacific Avenue and drove to
8 1514 73rd Street in Tacoma for a short time, and then left the location. Agents continued
9 surveillance on TV6 and coordinated a traffic stop with a marked patrol car in order to
10 identify the driver. The officer in the marked patrol car observed a traffic violation, and
11 activated his emergency red and blue lights to pull over TV6. The driver of TV6
12 identified himself as JONATHAN YASIR VEGA RAMIREZ by providing his Sinaloa,
13 Mexico Driver's license. VEGA RAMIREZ was released with a verbal warning.

14 20. Investigators determined that TT15 and TT16 are listed as having the same
15 subscriber information. In my training and experience, this is a common tactic of drug
16 traffickers used to thwart law enforcement and disguise their identity. In my experience, I
17 and other law enforcement officers conducting similar investigations have witnessed
18 members of suspected DTOs utilize a common subscriber for various cellular devices
19 within their organization that are used by separate individuals. In this situation, CS-3
20 spoke with the users of both TT15 and TT16 while in the presence of agents.

21 21. I believe that because of the events that took place on this day, the
22 unknown involved parties using TT15, TT16, and TV6, are coconspirators of the
23 El Pariente DTO and coordinated the delivery of suspected methamphetamine to a DEA
24 CS. I believe that these individuals will continue to use TT15, TT16 and TV6 to
25 distribute drugs on behalf of the El Pariente DTO in western Washington and elsewhere.
26
27

22. On January 6, 2023, United States Magistrate Judge J. Richard Creatura signed a search warrant authorizing the collection of GPS location information for TT15 and TT16.

January 10, 2023 Surveillance and Identification of Target Vehicle 7 (TV7)

23. In January of 2023, agents from the DEA Tacoma Resident Office conducted surveillance of JONATHAN YASIR VEGA RAMIREZ, the user of Target Telephone 16 (TT16). Via a surveillance camera, agents observed a black Jeep Cherokee bearing temporary tag number 0935505 (further referred to as Target Vehicle 7, or TV7) enter the parking lot of the suspected residence of VEGA RAMIREZ, the “Royal Pacific Apartments” located at 7645 Pacific Ave., Tacoma, WA 98408. A grey Honda Accord also entered the parking lot. Agents observed two unidentified males each exit the respective driver’s seats of TV7 and the grey Honda Accord. Agents also witnessed a male matching the description of VEGA RAMIREZ approach from the direction of the apartment building and engage in conversation with the two unidentified males in the parking lot in the immediate vicinity of TV6. Agents witnessed VEGA RAMIREZ enter the driver’s seat of TV6 and the unknown male driver of the grey Honda Accord enter the passenger’s seat of TV6 after relocating the grey Honda Accord to the spot formerly occupied by TV6. Agents saw the third unidentified male walk towards TV7; however, he was not seen entering TV7. Shortly thereafter, TV6 departed 7645 Pacific Ave., driven by VEGA RAMIREZ. Agents later located TV6 parked in front of 1514 73rd St., Tacoma, where they began physical surveillance. While conducting physical surveillance at that location, agents observed VEGA RAMIREZ’s phone geolocation data moving south along Interstate 5 (I-5) toward Portland, despite TV6 still being under observation and parked at 1514 73rd Street. Agents also noted at this time that the grey Honda Accord was still parked in the lot at 7645 Pacific Avenue, but TV7 was no longer in the parking lot. Agents believed based on the sequence of events, that VEGA RAMIREZ had switched from TV6 to TV7 at 1514 73rd Street, prior to agents locating TV6 at that

1 location. Agents then observed that the location information for TT16 showed it traveling
2 to the area of Lincoln City Park in Portland, Oregon, where it remained for approximately
3 10 minutes before beginning to travel northbound toward Tacoma. Based on my training
4 and experience, I know that drug traffickers will typically take trips of a significant
5 length with a very short time at the destination in order to replenish their drug supply, and
6 this was indicative of such a trip. Agents tracked TT16 back to 7645 Pacific Avenue, the
7 suspected residence of VEGA RAMIREZ, where they observed TV7 parked in the spot
8 marked "reserved," heretofore occupied by, and associated with, TV6. The return of TV7
9 to 7645 Pacific Avenue coincided with the geolocation data for VEGA RAMIREZ
10 showing him back at the address.

11 24. The following day, agents observed TV7 park in front of 1514 73rd Street,
12 where they observed VEGA RAMIREZ exit the vehicle and begin to approach TV6
13 before returning to the driver's seat of TV7 and driving to Milwaukie, Oregon, where
14 agents with the Joint Narcotics Task Force (JNET) observed TV7 briefly meet with a
15 blue Dodge Charger bearing Orgeon state license plate 825NXE. A records check,
16 followed by deconfliction check of Oregon state license plate 825NXE, determined that
17 the registered address of the blue Dodge Charger is 2088 SE Pinelane Street, Milwaukie,
18 OR 97267. Agents talked to a detective from the Multnomah County Sheriff's
19 Department, who was the point of contact for a Western States Information Network
20 (WSIN) deconfliction hit, who informed agents that Multnomah County had previously
21 served a search warrant at 2088 SE Pinelane Street, and recovered heroin in significant
22 quantities. Furthermore, the detective from Multnomah County informed agents that they
23 had discovered a stash house at 2088 SE Pinelane Street based on the fact that the DTO
24 they were investigating had been registering vehicles to that address.

25 **January 23, 2023 Surveillance and Identification of Target Vehicle 8 (TV8)**

26 25. In January of 2023, agents from the DEA Tacoma Resident Office
27 conducted surveillance of JONATHAN YASIR VEGA RAMIREZ, the user of TT16,

1 TV6 and TV7. On January 23, 2023, agents were monitoring tracker data from TV7 and
2 witnessed TV7 making a trip to Portland, Oregon early in the day. Based on my training
3 and experience, I know it is common for drug traffickers to make frequent trips of short
4 duration to further their illicit activities in either picking up or dropping off drugs or
5 proceeds from the sale of illegal drugs. During the period of collection of location data
6 for TT16, TV6, and TV7, the location data appears to indicate that VEGA RAMIREZ has
7 travelled to Portland, Oregon multiple times, each time returning to Tacoma after briefly
8 visiting various locations in or around Portland. Furthermore, on one of these trips
9 (discussed in paragraph 24, above), agents witnessed VEGA RAMIREZ meet with a
10 vehicle for a short period of time, and I later learned from law enforcement sources that
11 the address to which that vehicle was registered had been the subject of a search warrant
12 during which large amounts of heroin were located in the residence. Additionally, agents
13 researched the registered owner of the vehicle that had met with VEGA RAMIREZ, who
14 was determined to be ERNESTO FABRICIO GALEAS RODRIGUEZ. Agents
15 discovered that GALEAS RODRIGUEZ had been arrested in Colorado by the Northern
16 Colorado Drug Task Force in late November 2022 for drug trafficking. In light of this trip
17 by VEGA RAMIREZ, agents began surveillance of the known residence of VEGA
18 RAMIREZ at 7645 Pacific Avenue, Tacoma, WA 98408 and 1514 73rd Street, Tacoma,
19 WA 98408, where agents had previously seen VEGA RAMIREZ visit after selling CS-3
20 two pounds of methamphetamine, and on other occasions before suspected illegal
21 activity. Upon returning to the Tacoma area from Portland on January 23, 2023, agents
22 witnessed TV7 arrive at the Pacific Avenue residence of VEGA RAMIREZ and saw
23 VEGA RAMIREZ exit the vehicle and enter his apartment building. After a short amount
24 of time, agents saw VEGA RAMIREZ drive away from the apartments and to 1514 73rd
25 Street, where agents witnessed TV7 park directly behind TV6. After only a few minutes,
26 a grey Honda Accord bearing Sonora, Mexico license plate number VUW-622-B (further
27 referred to as **Target Vehicle 8**, or **TV8**) park behind TV7, which still contained VEGA

1 RAMIREZ who had remained inside the vehicle. An unknown Hispanic male (UM)
2 exited the passenger seat of **TV8**, and approached the driver's door of TV7. Agents saw
3 the door of TV7 open and the UM disappeared from the agent's view. After less than two
4 minutes, the door reopened and the UM returned to the passenger seat of **TV8**. Both
5 vehicles departed simultaneously. Based on my training, experience, and knowledge of
6 this investigation, this appeared to be a surreptitious meeting of the same nature as is
7 consistent with narcotics trafficking activities in general, and with narcotics transactions
8 that have been conducted in this investigation.

9 26. Agents followed the **TV8** to the Holiday Inn and Suites located at 8402 S
10 Hosmer St, Tacoma, WA 98444. Agents interviewed the front desk agent, who was able
11 to identify the user of TV8 as Berenice QUINONES based on the vehicle description and
12 plate number that QUINONES had provided to hotel staff. The front desk agent also told
13 agents that QUINONES was travelling with a Hispanic male as well. In researching
14 vehicle border crossings, **TV8** has been recorded crossing the border from Mexico to the
15 United States on a monthly basis, at near-regular intervals. Records of the crossings show
16 that the vehicle was occupied on those occasions by JESUS DANIEL ZAVALA JR (in
17 three of the crossings), and MARIA LORETO ROMERO QUEZEDA (on one of the
18 crossings). Based on my training and experience, I know that the aforementioned
19 behaviors are consistent with conduct common among drug traffickers and with the
20 tactics used to smuggle contraband into the United States on a regular basis while
21 evading suspicion by law enforcement.

22 27. Based on the foregoing, I respectfully submit there is probable cause to
23 believe that ZAVALA JR and/or ROMERO QUEZEDA and/or others are using **TV8** in
24 furtherance of drug trafficking, including violations of Title 21 of the United States Code.
25 Installing a tracking device and obtaining real time GPS tracking data on the location of
26 the Target Vehicle is necessary and appropriate to aid the investigation of this drug
27 trafficking organization. This application is part of an ongoing investigation into DTO

1 members and associates, both known and unknown. “Real time” GPS data on the Target
2 Vehicle would assist investigators in identifying DTO associates, their residences, and
3 possibly any stash location(s) used to store controlled substances. Investigators would be
4 able to easily locate the Target Vehicle in order to conduct surveillance, which could lead
5 to identifying other co-conspirators and/or sources of supply. Accordingly, there is
6 probable cause to believe that tracking the Target Vehicle will reveal evidence, fruits, and
7 instrumentalities of Title 21, United States Code, Sections 841 and 846.

8 28. I respectfully request that the Court issue a warrant authorizing members of
9 the DEA, or their authorized representatives, including but not limited to other law
10 enforcement agents and technicians assisting in the above-described investigation, to
11 install a tracking device in or on the Target Vehicle within the Western District of
12 Washington within 10 days of the issuance of the requested warrant, and to remove said
13 tracking device from the suspect vehicles after the use of tracking devices has ended; to
14 surreptitiously enter 8402 S Hosmer St, Tacoma, WA 98444, where the Target Vehicle
15 may be parked, and/or move the Target Vehicle to effect the installation, repair,
16 replacement, and removal of the tracking device; and to monitor the tracking device, for a
17 period of 45 days following the issuance of the warrant, including when the tracking
18 device is inside private garages and other locations not open to the public or visual
19 surveillance, both within and outside the Western District of Washington.

20 29. I further request, pursuant to 18 U.S.C. § 3103a(b) and Federal Rule of
21 Criminal Procedure 41(f)(3), that the Court authorize the officer executing the warrant to
22 delay notice until 90 days after the collection authorized by the warrant has been
23 completed. This delay is justified because there is reasonable cause to believe that
24 providing immediate notification of the warrant may have an adverse result, as defined in
25 18 U.S.C. § 2705. Providing immediate notice to the person(s) using the Target Vehicle
26 would seriously jeopardize the ongoing investigation, as such a disclosure would give
27 that person an opportunity to destroy evidence, change patterns of behavior, notify

1 confederates, and flee from prosecution. *See* 18 U.S.C. § 3103a(b)(1). There is reasonable
 2 necessity for the use of the technique described above, for the reasons set forth above.
 3 *See* 18 U.S.C. § 3103a(b)(2). Additionally, if necessary, I may request that the Court,
 4 upon a showing of good cause, order a further delay of the time permitted to serve notice,
 5 if necessary to protect the safety of any individual, avoid flight or destruction of
 6 evidence, and ensure that the investigation is not jeopardized prior to its completion.

7 30. I further request that the Court authorize execution of the warrant (i.e.,
 8 installation, monitoring, and removal) at any time of day or night, owing to the potential
 9 need to locate the Target Vehicle outside of daytime hours.

10 31. I further request that the Court order that all papers in support of this
 11 application, including the Affidavit and Tracking Warrant, be sealed until further order of
 12 the Court. These documents discuss an ongoing criminal investigation that is neither
 13 public nor known to all of the targets of the investigation. Accordingly, there is good
 14 cause to seal these documents because their premature disclosure may seriously
 15 jeopardize that investigation.


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**DAVID
CHIRDON** Digitally signed by
 DAVID CHIRDON
 Date: 2023.01.23
 18:17:17 -08'00'

David Chirdon
 Special Agent
 Drug Enforcement Administration

21 The above-named agent provided a sworn statement to the truth of the
 22 foregoing affidavit by telephone on the __23rd__ day of January, 2023.

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 S. KATE VAUGHAN
 United States Magistrate Judge

ATTACHMENT A

This warrant shall authorize agents with the Drug Enforcement Administration and other law enforcement agents/officers/technicians working with them, to place an autonomous GPS tracking device on the Target Vehicle described below:

Target Vehicle 8 (TV8): A grey 2010 Honda Accord, Vehicle Identification Number 5KBCP3675AB801056, bearing Sonora, Mexico plate number VUW-622-B, registration information unknown.

Agents are authorized to:

- a. install, remove, monitor, repair, or adjust an electronic tracking device on or within the Target Vehicle at any time of the day or night;
- b. if necessary to protect the safety of persons installing, removing, monitoring, repairing, or adjusting the electronic tracking device, or to protect the integrity of the investigation, surreptitiously enter the Target Vehicle at any time of the day or night, and move the subject vehicle from one location to another for the purpose of installing, removing, monitoring, repairing, or adjusting the device;
- c. surreptitiously re-enter the Target Vehicle at any time of the day or night, for the purpose of installing, removing, monitoring repairing, or adjusting the device;
- d. continuously monitor any and all signals emitted from the device, including when the Target Vehicle enters any structure or private property in which there may be a reasonable expectation of privacy; and
- e. move one or more tracker back and forth between Target Vehicle during the authorized tracking period as surveillance suggests would be most productive, with “execution” of the warrant having been accomplished if at least one tracker is installed on one Target Vehicle within ten days of issuance of the warrant.

Private Property

In addition to entering the Target Vehicle, agents may surreptitiously enter all driveways, roadways, parking areas (including any enclosed garage structure), and other places where the Target Vehicle may be parked at the following locations, in order to access the above-described vehicle pursuant to the warrant, at any time of the day or night:

8402 S Hosmer St, Tacoma, WA 98444

This authorization continues in any jurisdiction where the Target Vehicle may move for a period not to exceed forty-five (45) days.